

DOCKET NO. 2021-374-E

**SOUTH CAROLINA OFFICE OF
REGULATORY STAFF'S FIRST
AND CONTINUING REQUEST
FOR BOOKS, RECORDS, AND
OTHER INFORMATION**

**K. CHAD BURGESS, ESQUIRE, AND MATTHEW W. GISSENDANNER,
ESQUIRE, ATTORNEYS FOR DOMINION ENERGY SOUTH CAROLINA, INC.:**

The South Carolina Office of Regulatory Staff (“ORS”) hereby requests, pursuant to S.C. Ann. §§ 58-4-50(A), 58-4-55, and 58-27-160, 58-27-1300, 58-27-1570, and 58-27-1580, and applicable law that Dominion Energy South Carolina, Inc. (“DESC” or the “Company”) provide responses to the following requests for books, records, and other information electronically and in writing where required and under oath and serve the undersigned by March 2, 2021, to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina 29201.

DEFINITIONS

As used in these Requests, “identify” means, when asked to identify a person, to provide the full name, business title, address, and telephone number. As used in these Requests, “address” means mailing address and business address. When asked to identify or provide a document, “identify” and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word “document” is used herein, it means any

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written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

“Party” is defined as every entity that has intervened in, petitioned to intervene in, filed an Application in, or is otherwise a party of record to these dockets, and each Party’s officers, agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on the Party’s behalf.

The words “you” and “your” refer to DESC, as well as their officers, agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on the Company’s behalf.

Wherever in this Request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

INSTRUCTIONS

1. Pursuant to S.C. Code Ann. § 58-4-55(A), all responses shall be submitted under oath.
2. This Request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
3. In addition to the signature and verification at the close of the responses, the witness(es), employee(s), contractor(s), or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
4. If the Company believes that a response to any of the Requests was previously submitted to ORS, please cite the document and page number in the response.
5. If information requested herein is found in other places or other exhibits, reference shall *not* be made to those other places or other exhibits; instead, the information

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shall be reproduced, and an additional copy shall be produced in response to the Request in the appropriate numerical sequence.

6. If the response to any Request is that the information requested is not currently available, state when the information requested will be available and provided to ORS. This statement is not a waiver of the deadline for all other responses.
7. If you are unable to respond to any of the Requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.
8. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to ORS to assess the basis of any such claim. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.
9. All responses to the Requests below shall be labeled using the same numbers as used herein.
10. Each Request shall be reproduced and included in front of each set of responses.
11. All information requested below, unless otherwise specified, shall be provided in electronic form only unless otherwise requested.
12. All information available in Excel spreadsheets shall be provided in Excel. All Excel spreadsheets shall be working copies with all formulas, links, and calculations intact.
13. Responses containing .pdf documents must be searchable. Each electronic file must be clearly marked with the Response number.
14. Where a hardcopy response is requested, the Company shall provide one (1) paper copy/binder of all responses to ORS. The paper copy shall be bound in 3-ring binders with numbered tabs between each request. The request should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical. This entire list of requests shall be reproduced and included in front of each set of responses.
15. For every page produced to ORS that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which

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the Company designates as confidential information must also be marked by notation, highlighting, or other conspicuous means.

16. Any inquiries or communications relating to the Requests concerning clarification of the information requested below should be directed to Michael Seaman-Huynh [803.737.0850], Brandon Bickley [803.737.0990], Omari Thompson [803.737.7012], Andrew M. Bateman, Esquire [803.737.8440], or Christopher M. Huber, Esquire [803.737.5252] of ORS.

REQUESTS

- 1-1 If the competitive bid for the property that is the subject of the Company's Application in this docket is above the appraised value, do the shareholders or the Company's customers benefit?
- 1-2 Please provide a detailed estimate for the cost associated with compliance with the Commission's Order No. 2021-358 to market and competitively bid the property. Where will this cost be recorded on DESC's books and records?



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March 2, 2022
 Columbia, South Carolina